## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT COLUMBIA

BRANDON FRAZIER,	) )
Plaintiffs,	
<b>v.</b>	No. 1:12-cv-0128
ENOCH GEORGE, Sheriff of Maury	) ) JUDGE HAYNES
County, LT. DEBRA WAGONSHUTZ,	JURY DEMAND
FLOYD SEALEY, MAURY REGIONAL	AL) Quick
MEDICAL CENTER, ABL	) Dever
MANAGEMENT, INC., and	) Thus molly es
GENELLA POTTER,	) march and in har
Defendants.	This molines  This molines  the points  below to respect to

DEFENDANTS ABL MANAGEMENT, INC. AND
GENELLA POTTER'S MOTION TO COMPEL WRITTEN DISCOVERY

Come now Defendants ABL Management, Inc. and Genella Potter, (hereinafter "Defendants"), by and through counsel, pursuant to FEDERAL RULE OF CIVIL PROCEDURE 37(a), and move the Court to compel Plaintiff to respond to Defendants' First Set of Interrogatories and Requests for Production of Documents. In support of this Motion, Defendants rely upon the First Set of Written Discovery propounded by Defendants to Plaintiff on January 2, 2014, attached hereto as **Exhibit 1**; the February 3, 2014 letter from Paul Brewer to Gene Hallworth, attached hereto as **Exhibit 2**; and the letter from Paul Brewer to Gene Hallworth of February 11, 2014, attached hereto as **Exhibit 3**. Defendants also rely upon the Memorandum of Law and Statement Certifying Good Faith Effort to Resolve Discovery Dispute, which are filed contemporaneously herewith and incorporated herein by reference.

WHEREFORE, Defendants request that this Court compel Plaintiff to respond fully to the